

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

---

HONEYWELL INTERNATIONAL INC. and  
HONEYWELL INTELLECTUAL PROPERTIES  
INC.,

C.A. No. 04-1338 (KAJ)

Plaintiffs,

v.

APPLE COMPUTER, INC., et al.,

Defendants.

---

**AFFIDAVIT OF MICHAEL D. OKERLUND IN SUPPORT OF HONEYWELL'S  
OPPOSITION TO DEFENDANT ARIMA DISPLAY'S MOTION TO DISMISS FOR  
LACK OF PERSONAL JURISDICTION**

STATE OF MINNESOTA    )  
  ) ss  
COUNTY OF HENNEPIN    )

I, Michael D. Okerlund, do hereby declare and state as follows:

1. I am one of the attorneys representing the Plaintiffs in this matter. I am submitting this Affidavit in Support of Honeywell's Opposition to Defendant Arima Display's Motion to Dismiss for Lack of Personal Jurisdiction. I believe that the documents attached to this Affidavit as Exhibits A – H are true and accurate copies of what they purport to be.

2. Attached as Exhibit A is a true and correct copy of a "Welcome" page on Arima Computer Corporation's website, located at: <http://www.arima.com.tw/>.

3. Attached as Exhibit B is a true and correct copy of another version of the "Welcome" page on Arima Computer Corporation's website, which presents different pictures of various LCD devices as well as electronic links to information concerning those devices.

Clicking on the links marked “Mainstream Performance Value Line,” and “LCD PC, LCD TV,” transports the user to pages two and three of Exhibit B, both of which are also located at: <http://www.arima.com.tw/>.

4. Attached as Exhibit C is a true and correct copy of an internet page containing information concerning the “Arima” family of companies, which include Arima Communications, Arima Display, and Arima Computer Corporation. That website is located at: [http://www.arima.com.tw/about\\_group.htm](http://www.arima.com.tw/about_group.htm). Following the electronic link under Arima Computer will lead the user to information concerning Arima Computer’s LCD products, which include the 27” LCD TV, advertised on pages two and three of Exhibit C.

5. Attached as Exhibit D is a true and correct copy of a website page on Arima Computer Corporation’s website, with the headlines “Who We Are,” and “Where We Do Business.” Page two of Exhibit D provides information concerning Arima Computer Corporation’s factory and service center, located in Houston, Texas. Exhibit D is located at: [http://www.arima.com.tw/about\\_aboutarima.htm](http://www.arima.com.tw/about_aboutarima.htm).

6. Attached as Exhibit E is a true and correct copy of Arima Display’s English website listing a “Company Profile,” located at: <http://www.arimadisp.com/EN/about/main.htm>.

7. Attached as Exhibit F is a true and correct copy of a webpage that can be located on Arima Display’s website at: <http://www.arima.com.tw/> by following the link at the top of the page named “On-line Request For Quotation.”

8. Attached as Exhibit G is a true and correct copy of an email page that is automatically generated when a user visits Arima Display’s website, located at: <http://www.arima.com.tw/>. (see Exhibit E, *supra*), and clicks on the link labeled “Contact Us.”

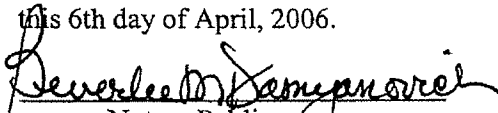
9. Attached as Exhibit H is a true and correct copy of a receipt from US Tronics, an online electronics retailer, listing a number of products purchased by Honeywell, including one Sony Ericsson "Z200 GSM World Phone" which was "torn down" by Honeywell employees and found to contain a LCD module manufactured by Arima Display.

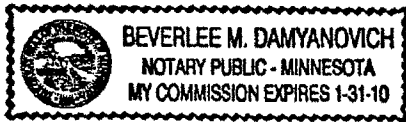
Further, affiant sayeth not.

  
\_\_\_\_\_  
Michael D. Okerlund

Subscribed and sworn to before me

this 6th day of April, 2006.

  
\_\_\_\_\_  
Notary Public



CERTIFICATE OF SERVICE

I hereby certify that on April 6, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF, which will send notification of such filing to the following: John R. Alison, Parker H. Bagley, Robert J. Benson, Robert Karl Beste, III, Elizabeth L. Brann, John M. Caracappa, Christopher E. Chalsen, Arthur G. Connolly, III, Frederick L. Cottrell, III, Francis DiGiovanni, Thomas M. Dunham, Amy Elizabeth Evans, York M. Faulkner, Christopher J. Gaspar, Alexander E. Gasser, Alan M. Grimaldi, Thomas C. Grimm, Thomas Lee Halkowski, Richard L. Horwitz, Dan C. Hu, John T. Johnson, Robert J. Katzenstein, Nelson M. Kee, Richard D. Kelly, Stephen S. Korniczky, Hamilton Loeb, Robert Maier, David J. Margules, David Ellis Moore, Carolyn E. Morris, Arthur I. Neustadt, Elizabeth A. Niemeyer, Kevin M. O'Brien, Gerard M. O'Rourke, Andrew M. Ollis, Karen L. Pascale, Adam Wyatt Poff, Leslie A. Polizoti, Alana A. Prills, Steven J. Rizzi, Avelyn M. Ross, Philip A. Rovner, Diana M. Sangelli, Robert C. Scheinfeld, Carl E. Schlier, John M. Seaman, Chad Michael Shandler, John W. Shaw, Neil P. Sirota, Monte Terrell Squire, William J. Wade, Roderick B. Williams and Edward R. Yoches.

I also certify that on April 6, 2006, I caused to be served true and correct copies of the foregoing on the following as indicated:

**BY HAND:**

William J. Wade  
RICHARDS LAYTON & FINGER  
One Rodney Square, P.O. Box 551  
Wilmington, DE 19899-0551

**BY FEDERAL EXPRESS:**

Dan C. Hu  
TROP PRUNER & HU, P.C.  
8554 Katy Freeway  
Houston, TX 77024-1834

*/s/ Leslie A. Polizoti*

---

Leslie A. Polizoti (#4299)  
[lpolizoti@mnat.com](mailto:lpolizoti@mnat.com)